

Remarks

This Application has been carefully reviewed in light of the final Office Action mailed October 30, 2003. Applicant thanks the Examiner for the courtesy of the telephone conference on December 17, 2003, during which the rejections under 35 U.S.C. § 103(a) were discussed. Claims 1-9, 12-13, 15, 19, 23, 26-27, 34, 37-38, 45, 48-49, and 56 have been amended to clarify, more particularly point out, and more distinctly claim inventive concepts previously present in these claims. These amendments are not considered necessary for patentability. Applicant respectfully requests reconsideration and allowance of all pending claims.

The Claims are Allowable over *Chow* and *Wimble*

The Examiner rejects Claims 1-56 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,226,693 to Chow et al. ("*Chow*") and further in view of U.S. Patent 5,778,230 to Wimble et al. ("*Wimble*"). Applicant respectfully disagrees.

Chow fails to disclose, teach, or suggest a system for managing event publication and subscription for event producer-consumers of heterogeneous types using a plurality of mappers each specific to a particular type of event producer-consumer, as recited in Claim 1 as amended. Furthermore, as discussed in Applicant's Response to the Office Action mailed May 7, 2003, *Chow* fails to disclose, teach, or suggest a physical event manager, in communication with but separate from a logical event manager, that comprises "a first mapper specific to the first type of the first event producer-consumer and operable to translate between the logical event manager and the first event producer-consumer" and "a second mapper specific to the second type of the second event producer-consumer and operable to translate between the logical event manager and the second event producer-consumer" as recited in independent Claim 1 as amended. Accordingly, *Chow* is wholly inadequate as a reference against independent Claim 1.

Wimble discloses a debugging system that includes a Logical to Physical Manager that maps a physical event into a set of logical events. (Abstract; Column 1, Lines 15-18; Column 10, Line 63-Column 11, Line 2; Column 11, Lines 24-29; Column 12, Lines 46-51) However, *Wimble* fails to disclose, teach, or suggest a system for managing event publication

and subscription for event producer-consumers of heterogeneous types using a plurality of mappers each specific to a particular type of event producer-consumer, as recited in Claim 1 as amended. *Wimble* also contains no disclosure, teaching, or suggestion of a logical event manager operating in cooperation with a separate physical event manager as recited in independent Claim 1. Furthermore, *Wimble* fails to disclose, teach, or suggest a physical event manager that is in communication with "the logical event manager, a first event producer-consumer of a first type, and a second event producer-consumer of a second type" and that comprises "a first mapper specific to the first type of the first event producer-consumer and operable to translate between the logical event manager and the first event producer-consumer" and "a second mapper specific to the second type of the second event producer-consumer and operable to translate between the logical event manager and the second event producer-consumer," where the first and the second event producer-consumers are of heterogeneous types as recited in independent Claim 1 as amended.

As clearly illustrated in Figure 13, *Wimble* merely discloses a Logical to Physical Manager that is in communication with a single primitive event object and thus performs only one type of mapping for the single primitive event object. (See Column 10, Lines 43-44) Accordingly, *Wimble* has no need for a first mapper and a second mapper each specific to a different type of event producer-consumer as recited in Claim 1. *Wimble* fails to even disclose, teach, or suggest heterogeneous types of event producer-consumers. Thus, *Wimble* clearly fails to disclose, teach, or suggest a physical event manager that is in communication with "the logical event manager, a first event producer-consumer of a first type, and a second event producer-consumer of a second type" and that comprises "a first mapper specific to the first type of the first event producer-consumer and operable to translate between the logical event manager and the first event producer-consumer" and "a second mapper specific to the second type of the second event producer-consumer and operable to translate between the logical event manager and the second event producer-consumer," where the first and the second event producer-consumers are of heterogeneous types as recited in independent Claim 1 as amended.

Accordingly, *Wimble* is also inadequate as a reference against independent Claim 1. Thus, even assuming for the sake of argument that there was the required suggestion or

motivation to combine *Chow* with *Wimble* as the Examiner proposes, the proposed *Chow-Wimble* combination would still fail to disclose, teach, or suggest the limitations specifically recited in independent Claim 1.

Applicant respectfully requests reconsideration and allowance of independent Claim 1, together with all of its dependent claims. Independent Claims 9, 13, and 19 recite certain limitations similar to those recited in independent Claim 1 with respect to mapping for heterogeneous types of event producer-consumers.¹ Accordingly, Applicant also respectfully requests reconsideration and allowance of independent Claims 9, 13, and 19, together with all of their dependent claims.

For the reason discussed above, *Chow* is wholly inadequate as a reference against independent Claim 23.

As discussed above, *Wimble* merely discloses a Logical to Physical Manager that is in communication with a single primitive event object and thus performs only one type of mapping for the single primitive event object. Accordingly, *Wimble* has no need for multiple mappers that each correspond to a particular type of event producer-consumer. Thus, *Wimble* fails to disclose, teach, or suggest "a plurality of mappers each corresponding to a particular type of event producer-consumer" as recited in independent Claim 23.

Accordingly, *Wimble* is also inadequate as a reference against independent Claim 23. Thus, even assuming for the sake of argument that there was the required suggestion or motivation to combine *Chow* with *Wimble* as the Examiner proposes, the proposed *Chow-Wimble* combination would still fail to disclose, teach, or suggest the limitations specifically recited in independent Claim 23.

Applicant respectfully requests reconsideration and allowance of independent Claim 23, together with all of its dependent claims. Independent Claims 34, 45, and 56 recite certain limitations similar to those recited in independent Claim 23 with respect to mapping

¹ Applicant does not necessarily agree with the Examiner's statement that Claims 12-13, 18-19, and 22 "have the same limitations" as Claim 1. (Office Action, Pages 4-5)

for heterogeneous types of event producer-consumers.² Accordingly, Applicant also respectfully requests reconsideration and allowance of independent Claims 34, 45, and 56, together with all of their dependent claims.

² Applicant does not necessarily agree with the Examiner's statements that Claims 32-33, 43-44, and 54-55 "have the same limitations" as Claims 30-31 and that Claim 56 "hs the same limitations" as Claim 23. (Office Action, Page 8)

Conclusion

Applicant has made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicant respectfully requests full allowance of all pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Christopher W. Kennerly, the Attorney for Applicant, at the Examiner's convenience at (214) 953-6812.

Applicant believes that no fees are due. However, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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